



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



JAN 18 2012

Peggy Shue  
Aera Energy LLC  
PO Box 11164  
Bakersfield, CA 93389

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # C-1121  
Project # 1062172**

Dear Ms. Shue:

The District has issued the Final Title V Permit for Aera Energy LLC. The preliminary decision for this project was made on October 27, 2011. A summary of the comments and the District's response to each comment is included with the Renewed Final Title V Permit and public notice to be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

David Warner  
Director of Permit Services

Attachments

cc: Richard Edgehill, Permit Services Engineer

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061  
[www.valleyair.org](http://www.valleyair.org) [www.healthyairliving.com](http://www.healthyairliving.com)

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



JAN 18 2012

Gerardo C. Rios, Chief  
Permits Office (AIR-3)  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # C-1121  
Project # 1062172**

Dear Mr. Rios:

The District has issued the Final Title V Permit Renewal for Aera Energy LLC. The preliminary decision for this project was made on October 27, 2011. A summary of the comments and the District's response to each comment is included with the Renewed Final Title V Permit and public notice to be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

David Warner  
Director of Permit Services

Attachments

cc: Richard Edgehill, Permit Services Engineer

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



JAN 18 2012

Mike Tollstrup, Chief  
Project Assessment Branch  
Air Resources Board  
P O Box 2815  
Sacramento, CA 95812-2815

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # C-1121  
Project # 1062172**

Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for Aera Energy LLC. The preliminary decision for this project was made on October 27, 2011. A summary of the comments and the District's response to each comment is included with the Renewed Final Title V Permit and public notice to be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

David Warner  
Director of Permit Services

Attachments

cc: Richard Edgehill, Permit Services Engineer

**Sayed Sadredin**  
Executive Director/Air Pollution Control Officer

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Fresno Bee

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT  
NOTICE OF FINAL DECISION TO ISSUE  
RENEWED FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the renewed Federally Mandated Operating Permit to Aera Energy LLC for its heavy oil production stationary source Fresno County, California.

The District's analysis of the legal and factual basis for this proposed action, project #1062172, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and the District office at the address below. For additional information regarding this matter, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500, or contact David Warner, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

Attachment  
for all 3  
letters

Aera Energy LLC  
C1121, 1062172

## Comments and Responses

### District Comments

During review of the draft TV permits, it was discovered that draft renewal PTO C-1121-114 for a TEOR incorrectly listed 240 wells. The current permit authorizes only 184 wells. Therefore the renewed permit has been revised to specify 184 wells.

During review of the draft TV permits, it was discovered that draft renewal PTO C-1121-168 for a flare incorrectly listed the rating as 83.3 MMBtu/hr. The rating of this flare had previously been revised by converted ATC C-1121-168-7 to 7.16 MMBtu/hr. Therefore the renewed permit has been revised to reflect a rating of 7.16 MMBtu/hr.

### Aera Comments

#### Comment 1

Waste Gas Steam Generator Draft Title V PTOs C-1121-17-18, '-18-18, '-19-18, and '-41-18

Aera requested deletion of conditions added in the draft renewed permits that require payment of Rule 4320 emission fees. These units are not complying with Rule 4320 NOx requirements by payment of emission fees. In fact these units have ATCs to be retrofit to meet the staged enhanced emission limits of Rule 4320 by 7/1/12.

#### Response 1

We concur. The subject conditions were added to the draft renewed permits in error. Therefore conditions requiring the payment of emission fees for these units have been removed.

#### Comment 2

Outstanding ATCs C-1121-39-11 (TEOR operation) and C-1121-168-10 (dormant flare) listed below have been implemented and should be incorporated into the renewed permits.

##### '-39-11

ADD 75 HP VAPOR COMPRESSOR SKID WITH OUTLET FIN-FAN COOLER,  
GAS LIQUID SEPARATORS, AND CONDENSATE PUMPS

##### '-168-10

LOWER ANNUAL SOX LIMIT SHARED WITH STEAM GENERATORS C-1121-17, -18, -19, AND -41 TO 28,580 LB/YR

## Response 2

Conversion of ATC C-1121-39-11 is awaiting submittal of the appropriate Title V modification application. Conversion of ATC C-1121-168-10 is awaiting District compliance inspection and submittal of the appropriate Title V modification application. Once these steps have been completed, these changes will be incorporated into the Title V permit. As such, the requested changes have not been incorporated into the renewed permits. Therefore this change was not included in the draft Title V PTO.

## **EPA Comments:**

### Comment 1

Evaluation of tanks with vapor control C-1121-45, 46, 72, 73, 79, 82, 83, 84, 85, 87, 88, 89, 90, 91 and wells with vapor control C-1121-38, 39, 114, 16 should include an evaluation of CAM requirements.

### Response 1

In our preliminary decision to renew the TV permit for this facility, we concluded vapor control systems serving crude oil tanks and production wells were inherent process equipment and as such the underlying emissions units were not equipped with a "control device" and therefore not subject to CAM requirements. We believe that this analysis is accurate and offer the following additional justification below.

For oilfield tanks and wells, CAM is required if an emission unit is subject to emission limit or standard to the pollutant of concern, uses a control device to comply with the emission limit or standard, and has a potential pre-control emissions greater than 10 ton/year.

While most tanks and wells equipped with a vapor control system include an emission limit or standard and have uncontrolled potential to emit greater than 10 ton/year, we have concluded that the vapor control systems that they are equipped with do not meet the criteria of control device as defined in 40 CFR part 64.

The definition of control device from 40 CFR Part 64 is as follows (emphasis added):

*Control device* means equipment, other than inherent process equipment, that is used to destroy or remove air pollutant(s) prior to discharge to the atmosphere. The types of equipment that may commonly be used as control devices include, but are not limited to, fabric filters, mechanical collectors, electrostatic precipitators, inertial separators, afterburners, thermal or catalytic incinerators,

adsorption devices (such as carbon beds), condensers, scrubbers (such as wet collection and gas absorption devices), selective catalytic or non-catalytic reduction systems, flue gas recirculation systems, spray dryers, spray towers, mist eliminators, acid plants, sulfur recovery plants, injection systems (such as water, steam, ammonia, sorbent or limestone injection), and combustion devices independent of the particular process being conducted at an emissions unit (e.g., the destruction of emissions achieved by venting process emission streams to flares, boilers or process heaters). For purposes of this part, a control device does not include passive control measures that act to prevent pollutants from forming, such as the use of seals, lids, or roofs to prevent the release of pollutants, use of low-polluting fuel or feedstocks, or the use of combustion or other process design features or characteristics. If an applicable requirement establishes that particular equipment which otherwise meets this definition of a control device does not constitute a control device as applied to a particular pollutant-specific emissions unit, then that definition shall be binding for purposes of this part.

It is important to note that this definition includes an exemption for “inherent process equipment. Inherent process equipment is by definition not a control device. Emission units equipped with inherent process equipment are not subject to the requirements of CAM.

40 CFR Part 64 defines inherent process equipment as (emphasis added):

*Inherent process equipment* means equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment. For the purposes of this part, inherent process equipment is not considered a control device.

Please note that the above definition requires that inherent process equipment must be used “... for the proper or safe operation of the process ...”. It is important to note that the equipment need not be used solely for the proper or safe operation of the process. Such systems could be used for compliance with regulations as well.

We have concluded that vapor control systems installed on oilfield tanks and oil production wells are inherent process equipment (and by definition not a control device) for the reasons stated below.

- Tank and well vapor control systems reduce emission of H<sub>2</sub>S (a toxic substance) from the tanks/wells and as such assure worker safety for OSHA and other regulatory requirements.
- Tank vapor control systems minimize air intrusion into the vapor space and as such reduces corrosion of the tank interior. Such systems are commonly installed even though they are not required to comply with District regulations. District Rule 4623 – Storage of Organic Liquids does not require vapor control on storage tanks storing liquids with a true vapor pressure of less than 0.5 psia. Due to the relatively low actual emissions from such tanks, vapor control is typically not a Rule 2201 best available control technology (BACT) requirement for most heavy crude oil storage tanks. Even though not required by District rules, facilities commonly install vapor control on storage tanks for safety and corrosion prevention purposes.
- As stated above, facilities commonly install vapor control on tanks even though there is not a requirement to do so. Vapor control has historically been installed on crude oil production well vents as well prior to the requirement to install such controls. In fact, the District has issued emission reduction credits for the installation of well vent vapor control systems.
- Vapors collected by tank and well vapor control systems are commonly burned in multiple existing units, e.g. steam generators, in which useful energy is recovered. Steam generators, are used in oil production to enhance oil recovery from production wells. The steam generators, wells and tanks (with their associated vapor control systems) are part of the overall process to thermally enhance oil production.

Such systems typically distribute the vapors to multiple steam generators (or other devices) for use as a fuel. The quantity of vapors from such vapor control systems combusted in a particular steam generator varies as the operational needs of the facility change. For example, vapors that are typically combusted in a given steam generator would be burned in a different approved steam generator instead if the first steam generator is taken out of service.

For all of the reasons stated above, we believe that tank and well vapor control systems are truly inherent to the oil production process. As such we believe that these systems meet the criteria for “inherent process systems”, and as such are not a control device for the purposes of CAM applicability. Therefore, we do not believe that the emission units that are served by such systems are subject to the requirements of CAM.

Notwithstanding the above, we agree to work cooperatively with EPA Region IX to address CAM applicability issues on a programmatic basis in the future.







**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**HEALTHY AIR LIVING™**

# Permit to Operate

**FACILITY:** C-1121

**EXPIRATION DATE:** 12/31/2016

**LEGAL OWNER OR OPERATOR:**  
**MAILING ADDRESS:**

AERA ENERGY LLC  
10000 MING AVE  
P O BOX 11164  
BAKERSFIELD, CA 93389-1164

**FACILITY LOCATION:**

HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

**FACILITY DESCRIPTION:**

PETROLEUM PRODUCTION

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

**Seyed Sadredin**  
Executive Director / APCO

**David Warner**  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

FACILITY: C-1121-0-2

EXPIRATION DATE: 12/31/2016

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: AERA ENERGY LLC

Location: HEAVY OIL PRODUCTION, FRESNO COUNTY, CA

C-1121-0-2, Jan 10 2012 7:53AM -- SCANDURL

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records, required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating not exempt as allowed by Sections 4.1 and 4.2 of Rule 4601 with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS (CONTINUE ON NEXT PAGE)

These terms and conditions are part of the Facility-wide Permit to Operate.

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-9-13

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 29 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

SG C-1, 62.5 MMBTU/HR THERMOTICS NATURAL GAS-FIRED STEAM GENERATOR, WITH COEN QLN ULN BURNER WITH FLUE GAS RECIRCULATION

## PERMIT UNIT REQUIREMENTS

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1. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
2. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. The unit shall only be fired on natural gas, containing no more than 1 grain of sulfur per 100 standard cubic feet. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts used to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Fuel consumption from the steam generator shall not exceed 1,430,000 scf/day of natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 15 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.018 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.014 lb-PM<sub>10</sub>/MMBtu, 50 ppmv CO @ 3% O<sub>2</sub>, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4201, 4305, and 4306] Federally Enforceable Through Title V Permit
10. Subject to the definitions and requirements of Section 5.3, District Rule 4306, emission factor limitations of this permit shall not apply during periods of startup, shutdown, or refractory curing. Duration of startup and shutdown shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining in the heat exchanger section of the unit, and shall not exceed 30 hours per occurrence. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC

Location: HEAVY OIL PRODUCTION, FRESNO COUNTY, CA

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11. Records of the duration of any startup, shutdown, or any refractory curing shall be maintained. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
12. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
13. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
14. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of the exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
16. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
17. NO<sub>x</sub>, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, and 4306] Federally Enforceable Through Title V Permit
19. The source plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



21. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO<sub>x</sub> (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H<sub>2</sub>S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. When complying with SO<sub>x</sub> emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, ARB Method 100; or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
25. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
26. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2 and 4305, 6.2.1] Federally Enforceable Through Title V Permit
27. The concentration of sulfur compounds in the exhaust from this unit shall demonstrate compliance using one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 9.4.2, 4301, 5.2.1 and Rule 4801, 3.1] Federally Enforceable Through Title V Permit
28. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
29. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
30. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO<sub>x</sub> emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO<sub>x</sub> emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
31. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS (CONTINUE ON NEXT PAGE)

These terms and conditions are part of the Facility-wide Permit to Operate.

32. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate: ~

Facility Name: AERA ENERGY LLC

Location: HEAVY OIL PRODUCTION, FRESNO COUNTY, CA

C-1121-9-13 : Jan 10 2012 7:53AM -- SCANDURL

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-10-13

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 29 **TOWNSHIP:** T19S **RANGE:** R15E

**EQUIPMENT DESCRIPTION:**

SG C-2, 62.5 MMBTU/HR THERMOTICS STEAM GENERATOR, GAS FIRED, WITH COEN QLN-ULN BURNER WITH FLUE GAS RECIRCULATION

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Fuel consumption shall not exceed 1,430,000 scf/day of natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Unit shall be exclusively fired with natural gas containing no more than 0.35 grain of total sulfur per 100 standard cubic feet of gas. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Emission rates during refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO<sub>2</sub>; sulfur - 200 pounds of SO<sub>2</sub> per hour, or 2000 ppmv as SO<sub>2</sub>, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO<sub>2</sub> - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, and 4801] Federally Enforceable Through Title V Permit
6. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
7. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
8. Emissions from the natural gas-fired steam generator shall not exceed any of the following limits: 0.001 lb-SO<sub>x</sub>/MMBtu, 0.014 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Except during start-up and shutdown periods and refractory curing, emissions from the natural gas-fired steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 43 ppmvd CO @ 3% O<sub>2</sub> or 0.032 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
10. During start-up and shutdown periods, emissions from the natural gas-fired steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

11. Emissions from the natural gas-fired steam generator shall not exceed either of the following limits: 51.5 lb-NOx/day or 45.8 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months, (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months, (no more than 30 days before or after the required 36 months source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
15. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
16. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
18. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
19. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 4468, D 4084, D 3246, or double GC for H2S and mercaptans. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

23. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
26. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Last Amended December 17, 1992), 4301 (Last Amended December 17, 1992), 4406 (Amended December 17, 1992), and 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
27. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts used to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
28. Permittee shall maintain records of duration of each start-up, shutdown, and refractory curing, per a period of five years and make such records readily available for District inspection upon request. [District Rules 2080 and 4306] Federally Enforceable Through Title V Permit
29. All records shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
30. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO<sub>x</sub> emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO<sub>x</sub> emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
31. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
32. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-11-9

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 29 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

DORMANT SG C-3, 62.5 MMBTU/HR THERMOTICS STEAM GENERATOR, GAS FIRED, WITH NORTH AMERICAN MODEL 6131G LONOX BURNER

## PERMIT UNIT REQUIREMENTS

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1. This unit shall not be operated unless the owner or operator applies to modify the Title V permit to address the requirements of District Rule 2520 section 9.0 for this permit unit. [District Rule 2520, Section 9.0] Federally Enforceable Through Title V Permit
2. This equipment shall not be operated for any reason until necessary retrofits are made to comply with the applicable requirements of District Rule 4305. [District NSR Rule and Rule 4305] Federally Enforceable Through Title V Permit
3. Emissions from this unit shall not exceed 30 ppm NOx (0.036 lb-NOx/MMBtu) @ 3% O<sub>2</sub>, nor 400 ppm CO @ 3% O<sub>2</sub> when fired on natural gas fuel. [District NSR Rule and Rule 4305, 5.1, 5.3] Federally Enforceable Through Title V Permit
4. No modification to this unit shall be performed without an Authority to Construct for that modification(s), except for changes specified in condition 5 below. [District NSR Rule] Federally Enforceable Through Title V Permit
5. All fuel supply lines shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
6. A source test to demonstrate compliance with the indicated emission limits shall be performed within 60 days of recommencing operation of this unit. [District Rule 1081] Federally Enforceable Through Title V Permit
7. Fuel consumption shall not exceed 1,430,000 scf/day of PUC quality natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Emissions from this unit shall not exceed 0.061 lb-NOx/MMBtu @ 3% O<sub>2</sub> calculated as NO<sub>2</sub>; 0.08 lb-SOx/MMBtu calculated as SO<sub>2</sub>; 0.032 lb-CO/MMBtu @ 3% O<sub>2</sub>; 0.057 lb-PM<sub>10</sub>/MMBtu calculated at 12% CO<sub>2</sub> nor 0.008 lb-VOC/MMBtu. [District NSR Rule, Rule 4201, 5.1 and Rule 4301, 5.1, 5.2] Federally Enforceable Through Title V Permit
9. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081, and County Rules 108 (Kings); 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
10. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts used to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC

Location: HEAVY OIL PRODUCTION, FRESNO COUNTY, CA

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11. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6 or ARB Method 100; or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2 and 4305, 6.2.1] Federally Enforceable Through Title V Permit
15. The concentration of sulfur compounds in the exhaust from this unit shall demonstrate compliance using one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.4.2, 4301, 5.2.1 and Rule 4801, 3.1] Federally Enforceable Through Title V Permit
16. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
17. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera), 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
18. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
19. NOx, and CO emissions shall be measured with annual source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NOx emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 4305, 6.3.2 and 4351, 6.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

22. The following conditions must be met for representative unit(s) to be used to test for NOx limits for a group of units:  
1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.4.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
23. All units in a group for which representative units are source for NOx emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). These tune-up procedures shall be completed according to District Rule 4304 (Adopted October 19, 1995) and tune-up test results shall show comparable results for each unit in the group. Records shall be maintained for the each unit of the group including all preventative and corrective maintenance work done. [District Rules 2520, 9.4.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
24. All units in a group for which representative units are source tested to for NOx emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.4.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
25. The number of representative units source tested for NOx emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
26. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
28. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-12-7

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 29 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

DORMANT SG C-4, 62.5 MMBTU/HR THERMOTICS GAS FIRED STEAM GENERATOR WITH NORTH AMERICAN MODEL 6131G LONOX BURNER

## PERMIT UNIT REQUIREMENTS

1. This permit unit shall not be operated unless the owner or operator applies to modify the Title V permit to address the requirements of District Rule 2520, section 9.0 for this permit unit. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
2. This equipment shall not be operated for any reason until necessary retrofits are made to comply with the applicable requirements of District Rule 4305 [District NSR Rule and Rule 4305] Federally Enforceable Through Title V Permit
3. No modification to this unit shall be performed without an Authority to Construct for that modification, except for changes specified in condition 4 below. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All fuel supply lines shall be physically disconnected from the unit. [District NSR Rule and Rule 4305] Federally Enforceable Through Title V Permit
5. Emissions from this unit shall not exceed 30 ppm NO<sub>x</sub>, (0.036 lb-NO<sub>x</sub>/MMBtu @ 3% O<sub>2</sub>), nor 400 ppm CO @ 3% O<sub>2</sub> when fired on natural gas fuel. [District NSR Rule and Rule 4305, 5.1, 5.3] Federally Enforceable Through Title V Permit
6. A source test to demonstrate compliance with the indicated emission limits shall be performed within 60 days of recommencing operation of this unit. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Fuel consumption shall not exceed 1,430,000 scf/day of PUC Quality natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Combined exhaust gases from the two CVR (C-1121-38 and -39) and the section 32 TVR systems shall not exceed 675,000 scf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Emissions shall not exceed 0.061 lb-NO<sub>x</sub>/MMBtu @ 3% O<sub>2</sub> calculated as NO<sub>2</sub>; 0.08 lb-SO<sub>x</sub>/MMBtu calculated as SO<sub>2</sub>; 0.032 lb-CO/MMBtu @ 3% O<sub>2</sub>; 0.057 lb-PM<sub>10</sub>/MMBtu calculated at 12% CO<sub>2</sub> nor 0.008 lb-VOC/MMBtu. [District NSR Rule, Rule 4201, 5.1 and Rule 4301, 5.1, 5.2] Federally Enforceable Through Title V Permit
10. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
11. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts used to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6 or ARB Method 100; or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.4.2 and 4305, 6.2.1] Federally Enforceable Through Title V Permit
16. The concentration of sulfur compounds in the exhaust from this unit shall demonstrate compliance using one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.4.2, 4301, 5.2.1 and Rule 4801, 3.1] Federally Enforceable Through Title V Permit
17. NOx, and CO emissions shall be measured with annual source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NOx emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 4305, 6.3.2 and 4351, 6.3] Federally Enforceable Through Title V Permit
20. The following conditions must be met for representative unit(s) to be used to test for NOx limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.4.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
21. All units in a group for which representative units are source for NOx emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). These tune-up procedures shall be completed according to District Rule 4304 (Adopted October 19, 1995) and tune-up test results shall show comparable results for each unit in the group. Records shall be maintained for the each unit of the group including all preventative and corrective maintenance work done. [District Rules 2520, 9.4.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

22. All units in a group for which representative units are source tested to for NOx emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.4.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
23. The number of representative units source tested for NOx emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
25. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
26. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-13-12

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 26 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS-FIRED THERMOTICS STEAM GENERATOR WITH COEN QLN LONOX BURNER AND FLUE GAS RECIRCULATION (SG N-5)

## PERMIT UNIT REQUIREMENTS

1. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
2. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
3. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera), 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The unit shall only be fired on natural gas, containing no more than 1 grain of sulfur per 100 standard cubic feet. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts used to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Fuel consumption from the steam generator shall not exceed 1,430,000 scf/day of natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 15 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.018 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.014 lb-PM<sub>10</sub>/MMBtu, 50 ppmv CO @ 3% O<sub>2</sub>, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4201, 4305, and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

9. Subject to the definitions and requirements of Section 5.3, District Rule 4306; emission factor limitations of this permit shall not apply during periods of startup, shutdown, or refractory curing. Duration of startup and shutdown shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining in the heat exchanger section of the unit, and shall not exceed 30 hours per occurrence. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
10. Records of the duration of any startup, shutdown, or any refractory curing shall be maintained. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
11. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
12. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
13. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
14. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
15. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
16. NO<sub>x</sub>, and CO emissions shall be measured with annual source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

18. The source plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO<sub>x</sub> (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H<sub>2</sub>S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
23. When complying with SO<sub>x</sub> emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, ARB Method 100; or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
25. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2, 4305, 6.2.1, and 4306] Federally Enforceable Through Title V Permit
26. The concentration of sulfur compounds in the exhaust from this unit shall demonstrate compliance using one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 9.4.2, 4301, 5.2.1 and Rule 4801, 3.1] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
29. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO<sub>x</sub> emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO<sub>x</sub> emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

30. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
31. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-14-13

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 29 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR THERMOTICS STEAM GENERATOR (SG N-6) GAS FIRED, WITH COEN QLN-ULN BURNER WITH FLUE GAS RECIRCULATION

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Fuel consumption shall not exceed 1,430,000 scf/day of natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Emission rates during refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO<sub>2</sub>; sulfur - 200 pounds of SO<sub>2</sub> per hour, or 2000 ppmv as SO<sub>2</sub>, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO<sub>2</sub> - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, and 4801] Federally Enforceable Through Title V Permit
7. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
8. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
9. Emissions from the natural gas-fired steam generator shall not exceed any of the following limits: 0.001 lb-SO<sub>x</sub>/MMBtu, 0.014 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Except during start-up and shutdown periods and refractory curing, emissions from the natural gas-fired steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 43 ppmvd CO @ 3% O<sub>2</sub> or 0.032 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



11. During start-up and shutdown periods, emissions from the natural gas-fired steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emissions from the natural gas-fired steam generator shall not exceed either of the following limits: 51.5 lb-NO<sub>x</sub>/day or 45.8 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months, (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months, (no more than 30 days before or after the required 36 months source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
16. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO<sub>x</sub> (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H<sub>2</sub>S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
20. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 4468, D 4084, D 3246, or double GC for H<sub>2</sub>S and mercaptans. [District Rule 2520, 9.3.2]] Federally Enforceable Through Title V Permit
22. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

23. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
25. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Last Amended December 17, 1992), 4301 (Last Amended December 17, 1992), 4406 (Amended December 17, 1992), and 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
28. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts used to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
29. Permittee shall maintain records of duration of each start-up, shutdown, and refractory curing, per a period of five years and make such records readily available for District inspection upon request. [District Rules 2080 and 4306] Federally Enforceable Through Title V Permit
30. All records shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
31. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO<sub>x</sub> emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO<sub>x</sub> emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
32. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

33. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-15-13

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 29 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR THERMOTICS STEAM GENERATOR (SG N-7), GAS FIRED, WITH COEN QLN-ULN BURNER WITH FLUE GAS RECIRCULATION

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Fuel consumption shall not exceed 1,430,000 scf/day of natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Emission rates during refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO<sub>2</sub>; sulfur - 200 pounds of SO<sub>2</sub> per hour, or 2000 ppmv as SO<sub>2</sub>, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO<sub>2</sub> - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, and 4801] Federally Enforceable Through Title V Permit
7. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
8. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
9. Emissions from the natural gas-fired steam generator shall not exceed any of the following limits: 0.001 lb-SO<sub>x</sub>/MMBtu, 0.014 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Except during start-up and shutdown periods and refractory curing, emissions from the natural gas-fired steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 43 ppmvd CO @ 3% O<sub>2</sub> or 0.032 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC

Location: HEAVY OIL PRODUCTION, FRESNO COUNTY, CA

C-1121-15-13 : Jan 10 2012 7:53AM - SCANDURL

11. During start-up and shutdown periods, emissions from the natural gas-fired steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emissions from the natural gas-fired steam generator shall not exceed either of the following limits: 51.5 lb-NO<sub>x</sub>/day or 45.8 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months, (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months, (no more than 30 days before or after the required 36 months source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
16. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO<sub>x</sub> (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H<sub>2</sub>S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
20. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 4468, D 4084, D 3246, or double GC for H<sub>2</sub>S and mercaptans. [District Rule 2520, 9.3.2]] Federally Enforceable Through Title V Permit
22. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

23. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
26. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Last Amended December 17, 1992), 4301 (Last Amended December 17, 1992), 4406 (Amended December 17, 1992), and 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
27. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts used to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
28. Permittee shall maintain records of duration of each start-up, shutdown, and refractory curing, per a period of five years and make such records readily available for District inspection upon request. [District Rules 2080 and 4306] Federally Enforceable Through Title V Permit
29. All records shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
30. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO<sub>x</sub> emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO<sub>x</sub> emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
31. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
32. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-16-12

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 29 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

SG N-8, 62.5 MMBTU/HR THERMOTICS STEAM GENERATOR, GAS FIRED, WITH NORTH AMERICAN MODEL 6131G LONOX BURNER WITH FLUE GAS RECIRCULATION

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Fuel consumption shall not exceed 1,430,000 scf/day of natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Emission rates during refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO<sub>2</sub>; sulfur - 200 pounds of SO<sub>2</sub> per hour, or 2000 ppmv as SO<sub>2</sub>, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO<sub>2</sub> - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, and 4801] Federally Enforceable Through Title V Permit
5. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
6. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
7. Emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed any of the following limits: 0.001 lb-SO<sub>x</sub>/MMBtu, 0.014 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Except during start-up and shutdown periods and refractory curing, emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 43 ppmvd CO @ 3% O<sub>2</sub> or 0.032 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
9. During start-up and shutdown periods, emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed either of the following limits: 51.5 lb-NO<sub>x</sub>/day or 45.8 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC

Location: HEAVY OIL PRODUCTION, FRESNO COUNTY, CA

C-1121-16-12; Jan 10 2012 7:53AM - SCANDURL

11. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months, (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months, (no more than 30 days before or after the required 36 months source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
14. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
17. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO<sub>x</sub> (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content, analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H<sub>2</sub>S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
18. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 4468, D 4084, D 3246, or double GC for H<sub>2</sub>S and mercaptans. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



22. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
25. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Last Amended December 17, 1992), 4301 (Last Amended December 17, 1992), 4406 (Amended December 17, 1992), and 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
26. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts used to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of duration of each start-up, shutdown, and refractory curing, per a period of five years and make such records readily available for District inspection upon request. [District Rules 2080 and 4306] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
29. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO<sub>x</sub> emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO<sub>x</sub> emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
30. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
31. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-17-18

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 26 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

SG S-9, 62.5 MMBTU/HR THERMOTICS, NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR WITH COEN QLN ULN BURNER AND FLUE GAS RECIRCULATION SERVED BY LO-COST H2S SCAVENGER SYSTEM SHARED WITH PERMIT UNITS C-1121-18, -19 AND -41

## PERMIT UNIT REQUIREMENTS

1. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
2. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera), 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
3. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
4. Only natural gas, vapor recovery gas, or a combination of natural gas and vapor recovery gas shall be used as fuel. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Lo-Cost H2S scavenging system shall be used whenever vapor recovery gas is fired in this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Fuel consumption for the steam generator shall not exceed 1,500 MMBtu/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Combined waste gas consumption for the four steam generators (C-1121-17, -18, -19, & -41) shall not exceed 675,000 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Permittee shall maintain daily record of all natural gas consumption including waste gas consumption, fuel sulfur content, calculated SOx emissions, supplier certifications and test results to show compliance with the conditions of this permit. The operator shall record daily amount and type (s) of fuel(s) combusted and all dates on which unit is fired on any non certified fuel and record specific type(s) of non certified fuel used. [District Rule 1070 and District Rule 2520, section 9.4.2] Federally Enforceable Through Title V Permit
9. Emissions from the steam generator shall not exceed any of the following limits: 53.5 lb-PM10/day, 573.8 lb-SOx/day calculated as SO2; 54.0 lb-NOx/day calculated as NO2, 12.0 lb-VOC/day, or 48.0 lb-CO/day. [District Rule 2201, Rule 4201, 3.1, Rule 4301, 5.1, 5.2 and 4305, 5.1, 5.3, and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

10. When fired only on natural gas, emissions from the steam generator shall not exceed any of the following limits: 0.0076 lb-PM10/MMBtu; 0.00285 lb-SOx/MMBtu calculated as SO<sub>2</sub>; 0.018 lb-NOx/MMBtu calculated as NO<sub>2</sub> @ 3% O<sub>2</sub> or 15 ppmv @ 3% O<sub>2</sub>; 0.008 lb-VOC/MMBtu, or 50 ppmv CO @ 3% O<sub>2</sub>. [District Rule 2201, Rule 4201, 3.1, Rule 4301, 5.1, 5.2 and 4305, 5.1, 5.3, and 4306] Federally Enforceable Through Title V Permit
11. When fired only on waste gas, emissions rates from the steam generator shall not exceed any of the following limits: 15 ppmv NOx @ 3% O<sub>2</sub> or 0.018 lb-NOx/MMBtu, 8.44 lb SOx/MMBtu, 0.633 lb-PM10/MMBtu, 50 ppmv CO @ 3% O<sub>2</sub>, or 0.008 lb-VOC/MMBtu. [District Rule 2201, Rule 4201, 3.1, Rule 4301, 5.1, 5.2 and 4305, 5.1, 5.3, and 4306] Federally Enforceable Through Title V Permit
12. Combined emissions of SOx, calculated as SO<sub>2</sub>, from the steam generators and the flare (C-1121-17, -18, -19, -41, & -168) shall not exceed 103,336 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The sulfur content of treated waste gas exiting the H<sub>2</sub>S Scavenger System shall not exceed 5000 ppmv. Sulfur content shall be determined on a daily basis by gas detector tube sampling. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The sulfur content and higher heating value of the treated waste gas exiting the H<sub>2</sub>S Scavenger System shall be determined on a bi-annual basis using grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Daily SOx emissions from combustion of waste gas shall be calculated based on the waste gas sulfur content as determined by gas detector tube sampling or the most recent laboratory analysis, whichever is greater. [District Rule 2201] Federally Enforceable Through Title V Permit
16. When source or type of gas changes, sampling for sulfur content shall be conducted within one week. A change in fuel type is defined as changing between any of the following: FUC-Quality gas, unprocessed field gas, or any field gas with any specific level of pretreatment. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, ARB Method 100 or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.4.2 and 4305, 6.2.1, and 4306] Federally Enforceable Through Title V Permit
21. The concentration of sulfur compounds in the exhaust from this unit shall demonstrate compliance using one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.4.2, 4301, 5.2.1 and Rule 4801, 3.1] Federally Enforceable Through Title V Permit
22. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

23. Subject to the definitions and requirements of Section 5.3, District Rule 4306, emission factor limitations of this permit shall not apply during periods of startup, shutdown, or refractory curing. Duration of startup and shutdown shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining in the heat exchanger section of the unit, and shall not exceed 30 hours per occurrence. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. Records of the duration of any startup, shutdown, or any refractory curing shall be maintained. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
25. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
26. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
28. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
30. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, and 4306] Federally Enforceable Through Title V Permit
31. The source plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO<sub>x</sub> (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H<sub>2</sub>S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
34. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
35. NO<sub>x</sub>, and CO emissions shall be measured with annual source testing conducted by independent testing laboratory with sample collection by ARB certified testing laboratory and shall be witnessed or authorized by the District. [District Rule 1081, 3.0, 4.0 and Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
36. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NO<sub>x</sub> and CO. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
37. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
38. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
39. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
40. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-18-18

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 29 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

SG S-10, 62.5 MMBTU/HR THERMOTICS, NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR WITH FLUE GAS RECIRCULATION SERVED BY LO-COST H2S SCAVENGER SYSTEM SHARED WITH PERMIT UNITS C-1121-17, -19 AND -41

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Fuel consumption shall not exceed 1,430,000 scf/day of natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Only natural gas, vapor recovery gas, or a combination of natural gas and vapor recovery gas shall be used as fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Combined exhaust gases combusted within this steam generator, from the four CVR systems (C-1121-38, -39, -114, & -116) and the section 32 TVR system shall not exceed 1,350,000 scf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Lo-Cost H2S scavenging system shall be used whenever vapor recovery gas is fired in this unit. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The sulfur content of treated waste gas exiting the H2S Scavenger System shall be determined on a daily basis by gas detector tube sampling. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The sulfur content and higher heating value of the treated waste gas exiting the H2S Scavenger System shall be determined on a bi-annual basis using double GC for H2S and mercaptans performed in the laboratory and EPA Method 19. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Daily SOx emissions from combustion of waste gas shall be calculated based on the waste gas sulfur content as determined by gas detector tube sampling or the most recent laboratory analysis, whichever is greater. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
10. Emission rates during refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur - 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, and 4801] Federally Enforceable Through Title V Permit
11. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
13. Emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed any of the following limits: 0.08 lb-SO<sub>x</sub>/MMBtu, 0.057 lb-PM<sub>10</sub>/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Except during start-up and shutdown periods and refractory curing, emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 43 ppmvd CO @ 3% O<sub>2</sub> or 0.032 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
15. During start-up and shutdown periods, emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed either of the following limits: 51.5 lb-NO<sub>x</sub>/day or 45.8 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months, (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months, (no more than 30 days before or after the required 36 months source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
23. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D 1072, D 4468, D 4084, D 3246, or double GC for H<sub>2</sub>S and mercaptans. [District Rules 1081, 4305, 4306, 6.2, and 4351] Federally Enforceable Through Title V Permit
24. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



25. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 4468, D 4084, D 3246, or double GC for H<sub>2</sub>S and mercaptans. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
28. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
29. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records; and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
31. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Last Amended December 17, 1992), 4301 (Last Amended December 17, 1992), 4406 (Amended December 17, 1992), and 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
32. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
33. Permittee shall maintain daily record of all natural gas consumption including waste gas consumption, fuel sulfur content, calculated SO<sub>x</sub> emissions, supplier certifications and test results to show compliance with the conditions of this permit. The operator shall record daily amount and type (s) of fuel(s) combusted and all dates on which unit is fired on any non certified fuel and record specific type(s) of non certified fuel used. [District Rule 1070 and District Rule 2520, section 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



34. Permittee shall maintain records of duration of each start-up, shutdown, and refractory curing, per a period of five years and make such records readily available for District inspection upon request. [District Rules 2080 and 4306] Federally Enforceable Through Title V Permit
35. All records shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
36. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
37. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-19-18

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 29    **TOWNSHIP:** 19S    **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

SG S-11, 62.5 MMBTU/HR THERMOTICS, NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR WITH FLUE GAS RECIRCULATION SERVED BY LO-COST H<sub>2</sub>S SCAVENGER SYSTEM SHARED WITH PERMIT UNITS C-1121-17, '-18 AND '-41

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Fuel consumption shall not exceed 1,430,000 scf/day of natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Only natural gas, vapor recovery gas, or a combination of natural gas and vapor recovery gas shall be used as fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Combined exhaust gases combusted within this steam generator, from the four CVR systems (C-1121-38, -39, -114, & -116) and the section 32 TVR system shall not exceed 1,350,000 scf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Lo-Cost H<sub>2</sub>S scavenging system shall be used whenever vapor recovery gas is fired in this unit. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The sulfur content of treated waste gas exiting the H<sub>2</sub>S Scavenger System shall be determined on a daily basis by gas detector tube sampling. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The sulfur content and higher heating value of the treated waste gas exiting the H<sub>2</sub>S Scavenger System shall be determined on a bi-annual basis using double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Daily SO<sub>x</sub> emissions from combustion of waste gas shall be calculated based on the waste gas sulfur content as determined by gas detector tube sampling or the most recent laboratory analysis, whichever is greater. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
10. Emission rates during refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO<sub>2</sub>; sulfur - 200 pounds of SO<sub>2</sub> per hour, or 2000 ppmv as SO<sub>2</sub>, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO<sub>2</sub> - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, and 4801] Federally Enforceable Through Title V Permit
11. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
13. Emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed any of the following limits: 0.08 lb-SO<sub>x</sub>/MMBtu, 0.057 lb-PM<sub>10</sub>/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Except during start-up and shutdown periods and refractory curing, emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 43 ppmvd CO @ 3% O<sub>2</sub> or 0.032 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
15. During start-up and shutdown periods, emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed either of the following limits: 51.5 lb-NO<sub>x</sub>/day or 45.8 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months, (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months, (no more than 30 days before or after the required 36 months source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
23. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO<sub>x</sub> (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H<sub>2</sub>S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 4468, D 4084, D 3246, or double GC for H<sub>2</sub>S and mercaptans. [District Rule 2520, 9.3.2]] Federally Enforceable Through Title V Permit
26. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
28. If periodic determination of FGR rate by O<sub>2</sub> measurement or if monitoring of burner mechanical adjustments and O<sub>2</sub> concentration are utilized during the 36-month source testing interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4306] Federally Enforceable Through Title V Permit
29. If periodic determination of FGR rate by O<sub>2</sub> measurement or if monitoring of burner mechanical adjustments and O<sub>2</sub> concentration are utilized, and if the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4306] Federally Enforceable Through Title V Permit
30. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
31. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
33. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Last Amended December 17, 1992), 4301 (Last Amended December 17, 1992), 4406 (Amended December 17, 1992), and 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

34. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
35. Permittee shall maintain daily record of all natural gas consumption including waste gas consumption, fuel sulfur content, calculated SOx emissions, supplier certifications and test results to show compliance with the conditions of this permit. The operator shall record daily amount and type (s) of fuel(s) combusted and all dates on which unit is fired on any non certified fuel and record specific type(s) of non certified fuel used. [District Rule 1070 and District Rule 2520, section 9.4.2] Federally Enforceable Through Title V Permit
36. Permittee shall maintain records of duration of each start-up, shutdown, and refractory curing, per a period of five years and make such records readily available for District inspection upon request. [District Rules 2080 and 4306] Federally Enforceable Through Title V Permit
37. All records shall be maintained and retained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
38. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
39. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-22-10

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 32 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

4.0 MMBTU/HR ENGELMAN GENERAL HEATER WITH NORTH AMERICAN MODEL 5131 GAS BURNER (PEER-1-0) AND PRESSURE RELIEF VENT TO VAPOR RECOVERY SYSTEM LISTED ON C-1121-45 (V-303)

## PERMIT UNIT REQUIREMENTS

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1. Pressure vessel shall maintain sufficient working pressure all the times that no organic liquid loss or VOC loss to the atmosphere shall occur. [District Rule 4623 and District NSR Rule] Federally Enforceable Through Title V Permit
2. The tank shall only vent to the vapor collection system listed on C-1121-45. [District NSR Rule and District Rule 4623] Federally Enforceable Through Title V Permit
3. Maximum VOC content of vapor in the vessel vapor space shall not exceed 10% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Vessel shall vent only to vapor control system except during periods of tank cleaning/repair, vapor control system maintenance, and power outages. [District NSR Rule] Federally Enforceable Through Title V Permit
5. All components in vapor service shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. [District NSR Rule and Rule 4623] Federally Enforceable Through Title V Permit
6. Seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule and Rule 4623] Federally Enforceable Through Title V Permit
7. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

11. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
15. Permittee shall conduct tank cleaning and maintenance operations in accordance with District approved procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
16. Vessel may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
17. Permittee shall notify the District Compliance division at least 24 hours before vessel cleaning and vapor control system disconnection and within 72 hours after restoring crude oil flow to the vessel. [District Rule 2080] Federally Enforceable Through Title V Permit
18. Prior to opening the vessel to allow vessel cleaning, one of the following procedures must be followed: 1) Prior to venting the vessel to the atmosphere, operate the vessel vapor recovery system/vapor control device for at least 24 hours such that it collects the vessel vapors; or 2) use liquid displacement, conducted using a liquid with a TVP less than 0.5 psia, or conducted by floating the oil pad off a crude oil tank by restricting the outflow of water, such that 90% of the vessel volume is displaced; or 3) Vent the vessel to a vapor control device/vapor recovery system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the vessel to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V/Q$ , where  $t$  = time,  $V$  = vessel volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
19. The vessel shall be cleaned using one of the following methods: water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. The vessel sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
20. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
21. Prior to reintroducing crude oil/water to the vessel, the tank shall be filled to the maximum possible level with water, the tank vapor control system shall be reactivated and pressure/relief valves closed, and the liquid level shall be adjusted as necessary. [District Rule 2080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

22. Within 48 hours after refilling the vessel with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular vessel maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
23. Permittee shall maintain records of each period of cleaning and maintenance when the vessel is disconnected or isolated from the vapor control system. Records shall include the date that vessel cleaning was initiated, the date vessel cleaning was completed, the procedure used to vent vessel vapors prior to opening, the method of vessel cleaning used, and a description of internal and external vessel repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
24. To qualify for quantification of no fugitive emissions, operator shall conduct quarterly gas sampling after the TVR compressor (prior to connection to any other vapor control system); and at either the first line vessel or at any secondary vessel which is heated above ambient temperature. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sample frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not within 48 hours of routine maintenance or repair. [District NSR Rule] Federally Enforceable Through Title V Permit
25. VOC content of vapor in vessel vapor space shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District NSR Rule] Federally Enforceable Through Title V Permit
26. The permittee shall keep accurate records of VOC content of the recovered gas from the vessel for a period of five years and shall make such records available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



**San Joaquin Valley  
Air Pollution Control District**

**PERMIT UNIT:** C-1121-23-14

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 32   **TOWNSHIP:** 19S   **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

2,235 BBL HEATER TREATER VESSEL WITH PRESSURE RELIEF VENT CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON C-1121-45 (V-304) AND PERMIT EXEMPT BURNER (NATURAL GAS-FIRED, 5.0 MMBTU/HR OR LESS)

**PERMIT UNIT REQUIREMENTS**

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1. This pressure vessel shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rule 4623] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC

Location: HEAVY OIL PRODUCTION, FRESNO COUNTY, CA

C-1121-23-14 : Jan 10 2012 7:53AM -- SCANDURL

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-24-6

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 32 **TOWNSHIP:** 19S **RANGE:** 15E

## **EQUIPMENT DESCRIPTION:**

6.0 MMBTU/HR ENGLEMAN GENERAL HEATER WITH TWO 3.0 MMBTU/HR NORTH AMERICAN MODEL #5131 GAS BURNERS AND PRESSURE RELIEF VENT TO VAPOR RECOVERY SYSTEM LISTED ON C-1121-45 (V-307)

## **PERMIT UNIT REQUIREMENTS**

1. Pressure vessel shall maintain sufficient working pressure all the times that no organic liquid loss or VOC loss to the atmosphere shall occur. [District Rule 4623 and District NSR Rule] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. The unit shall only be fired on natural gas, containing no more than 1 grain of sulfur per 100 standard cubic feet. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
7. Maximum annual heat input of the unit shall not exceed 9 billion Btu per calendar year. [District Rule 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
8. Fuel consumption shall not exceed 114,290 scf/day of natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 0.14 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0044 lb-PM<sub>10</sub>/MMBtu, 0.035 lb-CO/MMBtu, or 0.0028 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
10. The tank shall only vent to the vapor collection system listed on C-1121-45. [District NSR Rule and District Rule 4623] Federally Enforceable Through Title V Permit
11. Maximum VOC content of vapor in the vessel vapor space shall not exceed 10% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Vessel shall vent only to vapor control system except during periods of tank cleaning/repair, vapor control system maintenance, and power outages. [District NSR Rule] Federally Enforceable Through Title V Permit
13. All components in vapor service shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
22. This permit authorizes vessel cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
23. Permittee shall conduct vessel cleaning and maintenance operations in accordance with District approved procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Vessel may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
25. Permittee shall notify the District Compliance division at least 24 hours before vessel cleaning and vapor control system disconnection and within 72 hours after restoring crude oil flow to the vessel. [District Rule 2080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

26. Prior to opening the vessel to allow vessel cleaning, one of the following procedures must be followed: 1) Prior to venting the vessel to the atmosphere, operate the vessel vapor recovery system/vapor control device for at least 24 hours such that it collects the vessel vapors; or 2) use liquid displacement, conducted using a liquid with a TVP less than 0.5 psia, or conducted by floating the oil pad off a crude oil tank by restricting the outflow of water, such that 90% of the vessel volume is displaced; or 3) Vent the vessel to a vapor control device/vapor recovery system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the vessel to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V/Q$ , where  $t$  = time,  $V$  = vessel volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
27. The vessel shall be cleaned using one of the following methods: water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. The vessel sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
28. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
29. Prior to reintroducing crude oil/water to the vessel, the vessel shall be filled to the maximum possible level with water, the vessel vapor control system shall be reactivated and pressure/relief valves closed, and the liquid level shall be adjusted as necessary. [District Rule 2080] Federally Enforceable Through Title V Permit
30. Within 48 hours after refilling the vessel with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular vessel maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
31. Permittee shall maintain records of each period of cleaning and maintenance when the vessel is disconnected or isolated from the vapor control system. Records shall include the date that vessel cleaning was initiated, the date vessel cleaning was completed, the procedure used to vent vessel vapors prior to opening, the method of vessel cleaning used, and a description of internal and external vessel repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
32. To qualify for quantification of no fugitive emissions, operator shall conduct quarterly gas sampling after the TVR compressor (prior to connection to any other vapor control system); and at either the first line tank or at any secondary tank which is heated above ambient temperature. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sample frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not within 48 hours of routine maintenance or repair. [District NSR Rule] Federally Enforceable Through Title V Permit
33. VOC content of vapor in vessel vapor space shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District NSR Rule] Federally Enforceable Through Title V Permit
34. The permittee shall keep accurate records of VOC content of the recovered gas from the vessel for a period of five years and shall make such records available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts used to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
36. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

37. The concentration of sulfur compounds in the exhaust from this unit shall demonstrate compliance using one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
38. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
39. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
40. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
41. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
42. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-25-6

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 32 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

6.0 MMBTU/HR ENGLEMAN GENERAL HEATER WITH TWO 3.0 MMBTU/HR NORTH AMERICAN MODEL #5131 GAS BURNERS AND PRESSURE RELIEF VENT TO VAPOR RECOVERY SYSTEM LISTED ON C-1121-45 (V-308)

## PERMIT UNIT REQUIREMENTS

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1. Pressure vessel shall maintain sufficient working pressure all the times that no organic liquid loss or VOC loss to the atmosphere shall occur. [District Rule 4623 and District NSR Rule] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. The unit shall only be fired on natural gas, containing no more than 1 grain of sulfur per 100 standard cubic feet. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
7. Maximum annual heat input of the unit shall not exceed 9 billion Btu per calendar year. [District Rule 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
8. Fuel consumption shall not exceed 114,290 scf/day of natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 0.14 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0044 lb-PM<sub>10</sub>/MMBtu, 0.035 lb-CO/MMBtu, or 0.0028 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
10. The tank shall only vent to the vapor collection system listed on C-1121-45. [District NSR Rule and District Rule 4623] Federally Enforceable Through Title V Permit
11. Maximum VOC content of vapor in the vessel vapor space shall not exceed 10% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Vessel shall vent only to vapor control system except during periods of tank cleaning/repair, vapor control system maintenance, and power outages. [District NSR Rule] Federally Enforceable Through Title V Permit
13. All components in vapor service shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
22. This permit authorizes vessel cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
23. Permittee shall conduct vessel cleaning and maintenance operations in accordance with District approved procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Vessel may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
25. Permittee shall notify the District Compliance division at least 24 hours before vessel cleaning and vapor control system disconnection and within 72 hours after restoring crude oil flow to the vessel. [District Rule 2080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

26. Prior to opening the vessel to allow vessel cleaning, one of the following procedures must be followed: 1) Prior to venting the vessel to the atmosphere, operate the vessel vapor recovery system/vapor control device for at least 24 hours such that it collects the vessel vapors; or 2) use liquid displacement, conducted using a liquid with a TVP less than 0.5 psia, or conducted by floating the oil pad off a crude oil tank by restricting the outflow of water, such that 90% of the vessel volume is displaced; or 3) Vent the vessel to a vapor control device/vapor recovery system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the vessel to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V/Q$ , where  $t$  = time,  $V$  = vessel volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
27. The vessel shall be cleaned using one of the following methods: water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. The vessel sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
28. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
29. Prior to reintroducing crude oil/water to the vessel, the vessel shall be filled to the maximum possible level with water, the vessel vapor control system shall be reactivated and pressure/relief valves closed, and the liquid level shall be adjusted as necessary. [District Rule 2080] Federally Enforceable Through Title V Permit
30. Within 48 hours after refilling the vessel with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular vessel maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
31. Permittee shall maintain records of each period of cleaning and maintenance when the vessel is disconnected or isolated from the vapor control system. Records shall include the date that vessel cleaning was initiated, the date vessel cleaning was completed, the procedure used to vent vessel vapors prior to opening, the method of vessel cleaning used, and a description of internal and external vessel repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
32. To qualify for quantification of no fugitive emissions, operator shall conduct quarterly gas sampling after the TVR compressor (prior to connection to any other vapor control system); and at either the first line tank or at any secondary tank which is heated above ambient temperature. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sample frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not within 48 hours of routine maintenance or repair. [District NSR Rule] Federally Enforceable Through Title V Permit
33. VOC content of vapor in vessel vapor space shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District NSR Rule] Federally Enforceable Through Title V Permit
34. The permittee shall keep accurate records of VOC content of the recovered gas from the vessel for a period of five years and shall make such records available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts used to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
36. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



37. The concentration of sulfur compounds in the exhaust from this unit shall demonstrate compliance using one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
38. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
39. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
40. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
41. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
42. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-26-6

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 32 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

6.0 MMBTU/HR ENGLEMAN GENERAL HEATER WITH TWO 3.0 MMBTU/HR NORTH AMERICAN MODEL #6121-25H GAS BURNERS AND PRESSURE RELIEF VENT TO VAPOR RECOVERY SYSTEM LISTED ON C-1121-45 (V-309)

## PERMIT UNIT REQUIREMENTS

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1. Pressure vessel shall maintain sufficient working pressure all the times that no organic liquid loss or VOC loss to the atmosphere shall occur. [District Rule 4623 and District NSR Rule] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102].
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. The unit shall only be fired on natural gas, containing no more than 1 grain of sulfur per 100 standard cubic feet. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
7. Maximum annual heat input of the unit shall not exceed 9 billion Btu per calendar year. [District Rule 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
8. Fuel consumption shall not exceed 114,290 scf/day of natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 0.14 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0044 lb-PM10/MMBtu, 0.035 lb-CO/MMBtu, or 0.0028 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
10. The tank shall only vent to the vapor collection system listed on C-1121-45. [District NSR Rule and District Rule 4623] Federally Enforceable Through Title V Permit
11. Maximum VOC content of vapor in the vessel vapor space shall not exceed 10% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Vessel shall vent only to vapor control system except during periods of tank cleaning/repair, vapor control system maintenance, and power outages. [District NSR Rule] Federally Enforceable Through Title V Permit
13. All components in vapor service shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
22. This permit authorizes vessel cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
23. Permittee shall conduct vessel cleaning and maintenance operations in accordance with District approved procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Vessel may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
25. Permittee shall notify the District Compliance division at least 24 hours before vessel cleaning and vapor control system disconnection and within 72 hours after restoring crude oil flow to the vessel. [District Rule 2080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

26. Prior to opening the vessel to allow vessel cleaning, one of the following procedures must be followed: 1) Prior to venting the vessel to the atmosphere, operate the vessel vapor recovery system/vapor control device for at least 24 hours such that it collects the vessel vapors; or 2) use liquid displacement, conducted using a liquid with a TVP less than 0.5 psia, or conducted by floating the oil pad off a crude oil tank by restricting the outflow of water, such that 90% of the vessel volume is displaced; or 3) Vent the vessel to a vapor control device/vapor recovery system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the vessel to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V/Q$ , where  $t$  = time,  $V$  = vessel volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
27. The vessel shall be cleaned using one of the following methods: water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. The vessel sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
28. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
29. Prior to reintroducing crude oil/water to the vessel, the vessel shall be filled to the maximum possible level with water, the vessel vapor control system shall be reactivated and pressure/relief valves closed, and the liquid level shall be adjusted as necessary. [District Rule 2080] Federally Enforceable Through Title V Permit
30. Within 48 hours after refilling the vessel with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular vessel maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
31. Permittee shall maintain records of each period of cleaning and maintenance when the vessel is disconnected or isolated from the vapor control system. Records shall include the date that vessel cleaning was initiated, the date vessel cleaning was completed, the procedure used to vent vessel vapors prior to opening, the method of vessel cleaning used, and a description of internal and external vessel repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
32. To qualify for quantification of no fugitive emissions, operator shall conduct quarterly gas sampling after the TVR compressor (prior to connection to any other vapor control system); and at either the first line tank or at any secondary tank which is heated above ambient temperature. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sample frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not within 48 hours of routine maintenance or repair. [District NSR Rule] Federally Enforceable Through Title V Permit
33. VOC content of vapor in vessel vapor space shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District NSR Rule] Federally Enforceable Through Title V Permit
34. The permittee shall keep accurate records of VOC content of the recovered gas from the vessel for a period of five years and shall make such records available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts used to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
36. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

37. The concentration of sulfur compounds in the exhaust from this unit shall demonstrate compliance using one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
38. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
39. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
40. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
41. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
42. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-33-8

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 32 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

TG-1, 52.7 MMBTU/HR ALLISON GM 501-KB5 NATURAL GAS FIRED TURBINE WITH WATER INJECTION DRIVING A 4 MW ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. Unit shall be exclusively fired with natural gas containing no more than 1 grain of total sulfur per 100 standard cubic feet of gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fuel consumption shall not exceed 1,264.8 MMBtu/day of natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Emissions from this gas turbine shall not exceed any of the following limits: 201.1 lb-NOx/day, 4.8 lb-SOx/day, 16.9 lb-PM10/day, 116.4 lb-CO/day, or 48.4 lb-VOC/day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from this gas turbine (corrected to 15% O2) shall not exceed either of the following limits: 35 ppm NOx or 38 ppm CO. [District NSR Rule, 40 CFR 60.332(a)(2) and District Rule 4703, 5.1.2, 5.2] Federally Enforceable Through Title V Permit
5. The water-to-fuel ratio shall be maintained between 0.72 and 0.9 lb of water to pound of fuel. Operator shall perform and submit an engineering performance test to demonstrate continuous compliance with emissions limits beyond the specified ratios. [District NSR Rule and Rule 4703] Federally Enforceable Through Title V Permit
6. The owner or operator shall be required to conform to the compliance testing and sampling procedures described in District Rule 1081 (as amended 12/16/93). [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Sulfur compound emissions shall not exceed 0.2% by volume, 2,000 ppmv, on a dry basis averaged over 15 consecutive minutes. [40 CFR 60.333(a); Fresno County Rule 406] Federally Enforceable Through Title V Permit
9. If this unit is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334(b)(2) and District Rule 1070] Federally Enforceable Through Title V Permit
10. If this unit is not fired on PUC-regulated natural gas, the operator shall submit a semiannual report listing any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8% by weight. [40 CFR 60.334(c)(2)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

11. If this unit is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans, and fuel H<sub>2</sub>S content - Draeger tubes calibrated for H<sub>2</sub>S or other District-approved fuel sulfur detection method(s) or device(s). [40 CFR 60.335(d) and District Rule 1070] Federally Enforceable Through Title V Permit
12. If this unit is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. The owner or operator shall report periods of excess emissions that are defined as follows: any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the NO<sub>x</sub> emission limit. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, and gas turbine load. [40 CFR 60.334(c)(1)] Federally Enforceable Through Title V Permit
14. The owner or operator shall provide source test information annually regarding the exhaust gas NO<sub>x</sub> and CO concentration corrected to 15% O<sub>2</sub> (dry). EPA Methods 7E or 20 shall be used for NO<sub>x</sub> emissions. EPA Methods 10 or 10B shall be used for CO emissions. EPA Methods 3, 3A, or 20 shall be used for Oxygen content of the exhaust gas. [District Rule 4703, 5.1, 6.3.1, 6.4.1, 6.4.2, and 6.4.3] Federally Enforceable Through Title V Permit
15. The owner or operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation, and quantity of fuel used. [District Rule 4703, 6.2.4] Federally Enforceable Through Title V Permit
16. The HHV and LHV of the fuel combusted shall be determined using ASTM D3588, ASTM 1826, or ASTM 1945. [District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
17. Permittee shall install, operate and maintain in calibration, to within 5% accuracy, a monitoring system which continuously measures and records the water-to-fuel ratio and fuel consumption and which correlates the water-to-fuel ratio during initial source testing with the NO<sub>x</sub> concentration in the exhaust. [District NSR Rule, Rule 4703, 6.2.2 and 40 CFR 60.334(a)] Federally Enforceable Through Title V Permit
18. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Fresno County Rules 108.1 as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
19. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Fresno County Rule 406 as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
20. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a)(2), (c), and (f), 60.333 (a) and (b); 60.334(a), (c)(1), (c)(2), and (c)(3), and 60.335(b), (c)(2), (c)(3), and (d); District Rule 4703 (as amended 12/19/02), Sections 5.1.2, 5.2, 6.1, 6.3.1, 6.3.3, 6.4, 6.4.5, and 6.4.6 as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), 60.8, 60.8(d), 60.13, and 60.13(b); District Rule 1081 (as amended 12/16/93) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-34-8

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 32 **TOWNSHIP:** 19S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

TG-2, 52.7 MMBTU/HR ALLISON GM 501-KB5 NATURAL GAS FIRED TURBINE WITH WATER INJECTION DRIVING A 4 MW ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. Unit shall be exclusively fired with natural gas containing no more than 1 grain of total sulfur per 100 standard cubic feet of gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fuel consumption shall not exceed 1,264.8 MMBtu/day of natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Emissions from this gas turbine shall not exceed any of the following limits: 201.1 lb-NOx/day, 4.8 lb-SOx/day, 16.9 lb-PM10/day, 116.4 lb-CO/day, or 48.4 lb-VOC/day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from this gas turbine (corrected to 15% O2) shall not exceed either of the following limits: 35 ppm NOx or 38 ppm CO. [District NSR Rule, 40 CFR 60.332(a)(2) and District Rule 4703, 5.1.2, 5.2] Federally Enforceable Through Title V Permit
5. The water-to-fuel ratio shall be maintained between 0.72 and 0.9 lb of water to pound of fuel. Operator shall perform and submit an engineering performance test to demonstrate continuous compliance with emissions limits beyond the specified ratios. [District NSR Rule and Rule 4703] Federally Enforceable Through Title V Permit
6. The owner or operator shall be required to conform to the compliance testing and sampling procedures described in District Rule 1081 (as amended 12/16/93). [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Sulfur compound emissions shall not exceed 0.2% by volume, 2,000 ppmv, on a dry basis averaged over 15 consecutive minutes. [40 CFR 60.333(a); Fresno County Rule 406] Federally Enforceable Through Title V Permit
9. If this unit is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334(b)(2) and District Rule 1070] Federally Enforceable Through Title V Permit
10. If this unit is not fired on PUC-regulated natural gas, the operator shall submit a semiannual report listing any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8% by weight. [40 CFR 60.334(c)(2)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC

Location: HEAVY OIL PRODUCTION, FRESNO COUNTY, CA

C-1121-34-8 : Jan 10 2012 7:54AM - SCANDURL



11. If this unit is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans, and fuel H<sub>2</sub>S content - Draeger tubes calibrated for H<sub>2</sub>S or other District-approved fuel sulfur detection method(s) or device(s). [40 CFR 60.335(d) and District Rule 1070] Federally Enforceable Through Title V Permit
12. If this unit is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. The owner or operator shall report periods of excess emissions that are defined as follows: any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the NO<sub>x</sub> emission limit. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, and gas turbine load. [40 CFR 60.334(c)(1)] Federally Enforceable Through Title V Permit
14. The owner or operator shall provide source test information annually regarding the exhaust gas NO<sub>x</sub> and CO concentration corrected to 15% O<sub>2</sub> (dry). EPA Methods 7E or 20 shall be used for NO<sub>x</sub> emissions. EPA Methods 10 or 10B shall be used for CO emissions. EPA Methods 3, 3A, or 20 shall be used for Oxygen content of the exhaust gas. [District Rule 4703, 5.1, 6.3.1, 6.4.1, 6.4.2, and 6.4.3] Federally Enforceable Through Title V Permit
15. The owner or operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation, and quantity of fuel used. [District Rule 4703, 6.2.4] Federally Enforceable Through Title V Permit
16. The HHV and LHV of the fuel combusted shall be determined using ASTM D3588, ASTM 1826, or ASTM 1945. [District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
17. Permittee shall install, operate and maintain in calibration, to within 5% accuracy, a monitoring system which continuously measures and records the water-to-fuel ratio and fuel consumption and which correlates the water-to-fuel ratio during initial source testing with the NO<sub>x</sub> concentration in the exhaust. [District NSR Rule, Rule 4703, 6.2.2 and 40 CFR 60.334(a)] Federally Enforceable Through Title V Permit
18. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Fresno County Rules 108.1 as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
19. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Fresno County Rule 406 as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
20. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a)(2), (c), and (f), 60.333 (a) and (b); 60.334(a), (c)(1), (c)(2), and (c)(3), and 60.335(b), (c)(2), (c)(3), and (d); District Rule 4703 (as amended 12/19/02), Sections 5.1.2, 5.2, 6.1, 6.3.1, 6.3.3, 6.4, 6.4.5, and 6.4.6 as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), 60.8, 60.8(d), 60.13, and 60.13(b); District Rule 1081 (as amended 12/16/93) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-38-8

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 29 **TOWNSHIP:** 19S **RANGE:** 15E

## **EQUIPMENT DESCRIPTION:**

CVR-1: 155 STEAM-DRIVE WELLS SERVED BY 170 HP CASING VAPOR RECOVERY SYSTEM WITH HEAT EXCHANGER E-100, FIN FAN COOLER E-110, SEPARATOR V-100, CONDENSATE PUMPS P-100 AND P-101, AND GAS COMPRESSOR SKID WITH COMPRESSOR C-10, FIN FAN COOLER E-10, SEPARATORS V-10 AND V-11 AND CONDENSATE PUMP P-10.

## **PERMIT UNIT REQUIREMENTS**

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1. Non-condensibles shall be exhausted into a working steam generator firebox or flare for combustion. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Casing vapor recovery system shall be operated to achieve at least 99% control efficiency. [District Rule 4401, 5.2] Federally Enforceable Through Title V Permit
3. If the well casing vent is sealed or "shut-in", then the produced oil is to be routed only to tanks served by the vapor recovery system under permit #C-1121-45 with 99% control efficiency. [District NSR Rule and Rule 4401, 5.2] Federally Enforceable Through Title V Permit
4. VOC emissions shall not exceed 2.237 lb VOC/day per well. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401 3.20] Federally Enforceable Through Title V Permit
6. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the requirements of District Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
7. The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
8. An operator shall not operate a steam-enhanced crude oil production well unless either of the following two conditions are met: 1) The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids is connected to a VOC collection and control system as defined in Section 3.0 of this Rule or 2) the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0. [District Rule 4401, 5.5.1 and 5.5.2] Federally Enforceable Through Title V Permit
9. There shall be no open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.2.2.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. There shall be no components with a major liquid leak as defined in Section 3.20.2 of Rule 4401. [District Rule 4401, 5.2.2.2] Federally Enforceable Through Title V Permit
11. There shall be no components with a gas leak of greater than 50,000 ppmv. [District Rule 4401, 5.2.2.3] Federally Enforceable Through Title V Permit
12. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401, 5.2] Federally Enforceable Through Title V Permit
13. No leaking components (as defined in Section 5.2.2 of Rule 4401) may be used unless they have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
14. Each hatch shall be closed at all times except during attended repair, replacement, or maintenance operations, providing such activities are done as expeditiously as possible with minimal spillage or material and VOC emissions into the atmosphere. [District Rule 4401, 5.3.2] Federally Enforceable Through Title V Permit
15. The operator shall comply with the requirements of Section 6.7 if there is any change in the description of major components or critical components. [District Rule 4401, 5.3.3] Federally Enforceable Through Title V Permit
16. Unless otherwise specified in Section 5.4, an operator shall perform all component inspections and gas leak measurements pursuant to the requirements of Section 6.3.3. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
17. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 at least once every year. [District Rule 4401, 5.4.1] Federally Enforceable Through Title V Permit
18. An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 4 of this Rule. [District Rule 4401, 5.4.2] Federally Enforceable Through Title V Permit
19. An operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: 1) An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. 2) Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 4 of this Rule. [District Rule 4401, 5.4.3] Federally Enforceable Through Title V Permit
20. The operator shall also perform the following inspections: 1) An operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. An operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. 2) An operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service, and 3) Except for PRDs subject to the requirements of Section 5.8.4.1 of this Rule, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401, 5.4.4] Federally Enforceable Through Title V Permit
21. Components located in unsafe areas shall be inspected and repaired at the next process unit turnaround and inaccessible components shall be inspected at least annually. [District Rule 4401, 5.4.7] Federally Enforceable Through Title V Permit
22. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401, 5.4.8] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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23. Upon detection of a leak, an operator shall affix a readily visible weatherproof tag to that leaking component that includes the following information: 1) The date and time of leak detection; 2) The date and time of the leak measurement; 3) For a gaseous leak, the leak concentration in ppmv; 4) For a liquid leak, whether it is a major or minor liquid leak; and 5) Whether the component is an essential component, and unsafe-to-monitor component, or a critical component. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
24. The tag shall remain affixed to the leaky component until all the following requirements are met: 1) The component is repaired or replaced, 2) The component is re-inspected as set forth in Section 6.3, and 3) The component is found to be in compliance with this Rule. [District Rule 4401, 5.5.2] Federally Enforceable Through Title V Permit
25. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401, 5.5.3] Federally Enforceable Through Title V Permit
26. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.9.7, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0, an operator shall comply with at least one of the following three requirements as soon as practicable but not later than the time period specified in Table 4: 1) Repair or replace the leaking component, 2) Vent the leaking component to a VOC collection and control system as defined in Section 3.0, or 3) Remove the leaking component from operation. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
27. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
28. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3. [District Rule 4401, 5.5.5] Federally Enforceable Through Title V Permit
29. The time of the initial leak detection shall be the start of the repair period specified in Table 3. [District Rule 4401, 5.5.6] Federally Enforceable Through Title V Permit
30. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401, 5.5.7] Federally Enforceable Through Title V Permit
31. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1.1] Federally Enforceable Through Title V Permit
32. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit
33. The operator of any steam-enhanced crude oil production well shall maintain an inspection log pursuant to Section 6.4 of Rule 4401. [District Rule 4401, 6.1.4] Federally Enforceable Through Title V Permit
34. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration [District Rule 4401, 6.1.5] Federally Enforceable Through Title V Permit
35. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401, 6.2.1] Federally Enforceable Through Title V Permit
37. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401, 6.2.2] Federally Enforceable Through Title V Permit
38. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct an initial TVP testing of the produced fluid in each gauge tank not later than June 14, 2007. Thereafter, an operator shall conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401, 6.2.3] Federally Enforceable Through Title V Permit
39. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit
40. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
41. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401, 6.3.3] Federally Enforceable Through Title V Permit
42. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

43. The operator shall maintain an inspection log in which the operator records at least all of the following for each inspection performed: 1) The total number of components inspected, and the total number and percentage of leaking components found by component type, 2) The location, type and name or description of each leaking component and description of any unit where the leaking component is found, 3) The date of leak detection and the method of leak detection, 4) For gaseous leaks, the leak concentration in ppmv and, for liquids leaks, whether the leak is major or minor, 5) The date of repair, replacement or removal from operation of leaking components, 6) The identity and location of essential components and critical components as defined in this Rule, found leaking, that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, 7) The methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than 1 year after detection, whichever comes earlier, 8) The date or re-inspection and the leak concentration in ppmv after the component is repaired or replaced, 9) The inspectors name, business mailing address, and business telephone number, and 10) The date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
44. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit
45. By January 30 of each year, an operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to an existing Operator Management Plan. [District Rule 4401, 6.7] Federally Enforceable Through Title V Permit
46. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
47. Compliance with permit Condition 2 on the Title V permit shall be deemed compliance with efficiency specification which have been waived by exhausting non-condensibles into a working steam generator firebox or flare for combustion. A permit shield is granted from there requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
48. The crude oil production wells associated with this unit do not have production enhanced by in-situ combustion. Therefore, the requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1121-39-10

**EXPIRATION DATE:** 12/31/2016

**SECTION:** 29 **TOWNSHIP:** 19S **RANGE:** 15E

## **EQUIPMENT DESCRIPTION:**

CVR-2: 213 STEAM-DRIVE WELLS SERVED BY 140 HP CASING VAPOR RECOVERY SYSTEM WITH HEAT EXCHANGER E-200, FIN-FAN COOLER E-210, SEPARATOR V-200, CONDENSATE PUMPS P-200 & P-201, AND GAS COMPRESSOR SKID WITH COMPRESSOR C-20, FIN-FAN COOLER E-20, SEPARATORS V-20 & V-21, AND CONDENSATE PUMP P-20. RECOVERED VAPOR LINE CONNECTED TO RECOVERED VAPOR LINES OF PERMIT UNITS C-1121-116 & C-1121-114

## **PERMIT UNIT REQUIREMENTS**

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1. Non-condensibles shall be exhausted into a working steam generator firebox or flare for combustion. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
3. If the well casing vent is sealed or "shut-in", then the produced oil is to be routed only to tanks served by the vapor recovery system under permit #C-1121-45 with 99% control efficiency. [District NSR Rule and Rule 4401, 5.2] Federally Enforceable Through Title V Permit
4. VOC emissions shall not exceed 2.222 lb VOC/day per well. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401 3.20] Federally Enforceable Through Title V Permit
6. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the requirements of District Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
7. An operator shall not operate a steam-enhanced crude oil production well unless either of the following two conditions are met: 1) The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids is connected to a VOC collection and control system as defined in Section 3.0 of this Rule or 2) the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0. [District Rule 4401, 5.5.1 and 5.5.2] Federally Enforceable Through Title V Permit
8. There shall be no open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.2.2.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: AERA ENERGY LLC

Location: HEAVY OIL PRODUCTION, FRESNO COUNTY, CA

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